

ORIGINAL

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

vs

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

DISTRICT COURT

No. 04-251 JJF

MOTION TO
COMPEL

**MOTION TO COMPEL DISCOVERY-PRODUCTION OF DOCUMENTS
AND ANSWERS TO INTERROGATORIES**

2007 AUG 24 AM 10:31

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

COMES NOW, Plaintiff, Ashley Adams, hereby moves this Honorable Court to compel discovery and pursuant to Federal Rule 37 (a) (4) sanctions.

In support of this motion, the Plaintiff states the following:

(1)

This suit arises out of an automobile accident that occurred April 23, 2002, whereby Jo Ellen Chapen Sheldon negligence operation of a motor vehicle causing severe bodily injury to Ashley Adams.

(2)

Plaintiff served defense attorney Request for Production of Documents on December 04, 2006, Defense Attorney files an instant Motion for Protection Order and the order was granted in favor of the Plaintiff, compelling Defendant to respond to production of documents and interrogatories. Defense Attorney responds July 26, 2007 with the Production of Documents. Answers to Interrogatories were due August 17, 2007; there has been no response.

(3)

Defendant responded incompletely to the Production of Document Requests on July 26, 2007. Each and every document request was "Objection, as this calls for information prepared in anticipation of litigation, protected by the attorney client privilege or the attorney work product doctrine". Some responded to "Without prejudice to these

objections, Defendant provides.....”, with the remaining requests for production of documents “”See Answer to Request for Production of #1”.

(4)

Interrogatories were received by the Defendant, July 17, 2007, with 30 days required response time. To this date, those Answers have not been completed.

(5)

Production #13 – Defendant’s vehicle pictures after the car repaired. Damages to the defendant’s vehicle is irrelevant to injuries sustained. Provide the State Farm document dated May 9, 2002 that documents defendants automobile examined by State Farm Insurance.

(6)

Interrogatories were hand-delivered to the Defendant, July 17, 2007, required to be answered within 30 days. To this date, those Answers have not been completed.

(7)

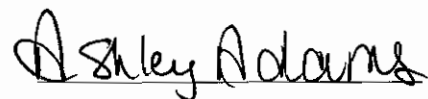
Defendant responded incompletely to the Production of Document Requests on July 26, 2007. Each and every document request was “Objection, as this calls for information prepared in anticipation of litigation, protected by the attorney client privilege or the attorney work product doctrine”. Some responded to “Without prejudice to these

objections, Defendant provides.....”, with the remaining requests for production of documents “”See Answer to Request for Production of #1”.

(8)

Plaintiff has conferred with Defendant to try to resolve these issues without success.

WHEREFORE, Plaintiff, Ashley Adams, asks this Honorable Court to grant her Motion to Compel Discovery for Production of Documents and Answers to Interrogatories and Order the Defendant to conform with the Court rules and apply sanctions as determined by the Court.

A handwritten signature in black ink that reads "Ashley Adams". The signature is written in a cursive, flowing style.

Ashley Adams, *Pro Se*, Plaintiff
PO Box 7652
Newark, DE 19714

Dated: August 24, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

:
:
:
:
:
:
:
DISTRICT COURT
:
:
:
No. 04-251 JJF
:
:
:
:
:
ORDER
:

ORDER

IT IS HEREBY ORDERED this ____ day of _____ 2007, for the reasons stated in Plaintiffs' Motion to Compel Discovery - Production of Documents and Answers to Interrogatories is **GRANTED** and the Defendant is ORDERED to respond with those productions and answers, and awards for Sanctions against the defendant in an amount as determined by the Court, as the Court sees appropriate.

United States District Judge

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

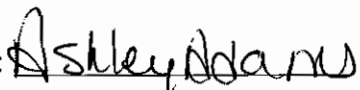
DEFENDANT

:
:
:
:
:
:
:
DISTRICT COURT
:
:
:
:
:
:
No. 04-251 JJF
:
:
:
:
:
:
HEARING REQUEST
:

REQUEST FOR A HEARING

Plaintiff, Ashley Adams hereby requests a Hearing on its

**MOTION TO COMPEL DISCOVERY - PRODUCTION OF DOCUMENTS
AND ANSWERS TO INTERROGATORIES**

By: 

Ashley Adams
PO Box 7652
Newark, DE 19714
302-393-3525
Plaintiff, pro se

FILING DATE: August 24, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

DISTRICT COURT

No. 04-251 JJF

SERVICE NOTICE

NOTICE OF SERVICE

I hereby give notice that I caused two (2) true and correct copies of the foregoing to be served upon the following on the date set forth below, via first class mail, postage prepaid, and/or hand-delivered:

**MOTION TO COMPEL DISCOVERY – PRODUCTION OF DOCUMENTS
AND ANSWERS TO INTERROGATORIES**

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: Ashley Adams

Ashley Adams
PO Box 7652
Newark, DE 19714

Dated: August 24, 2007